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From: Karl Halupka [Karl.Halupka@noaa.gov]
Sent: Thursday, May 20, 1999 11:40 AM
To: michael_fris@mail.fws.gov; SCANTREL@hq.dfg.ca.gov
Cc: 73420.1232@compuserve.com; jsingle@compuserve.com;
pherrges@delta.dfg.ca.gov; JWHITE@hq.dfg.ca.gov; REMPEL@hq.dfg.ca.gov;
mkie@water.ca.gov; Gary Stern
Subject: Re: MSCS species goal prescription for spring-run salmon

Scott,

I appreciate your position and have several comments:

1. In my opinion, the estimated goals provided by DFG are likely to be closer to the goals produced by a formal NMFS recovery planning process than are the goals in the Delta Native Fishes Recovery Plan, and I agree with the conceptual logic used to arrive at these estimates. These estimated goals, however, were hastily derived and probably received limited input or review from other agencies or independent scientists.

2. The properly functioning population (PFP) concept invoked in these estimated goals is currently under peer review, and has not been formally adopted or applied by NMFS. This concept, however, has received considerable support, and our expectation is that it could become the cornerstone of many of our regulatory actions (listing, 4d rule development, delisting criteria).

3. The DFG estimates were not derived using the analytical process that would be involved in NMFS application of the PFP concept.

4. Therefore, my primary concern is that inappropriate application of the PFP concept to justify the conservation goals proposed by DFG for spring run undermines the scientific credibility of this concept, diminishing its potential future uses, and potentially tarnishing its public perception, even before it is "out of the box" from our perspective. NMFS has gone to considerable lengths to protect the scientific credibility of our listing and recovery planning processes, and premature application of the PFP concept in this context will make it more difficult to achieve consensus on the application of this conceptual tool.

Consequently, if DFG insists that these estimates be included in the MSCS, I feel they should be clearly identified as DFG estimates based on "best professional judgment" and not the PFP concept.

This may appear to be a tempest in a teacup, but I think that maintaining scientific integrity is an important issue amid all the contention that surrounds any regulatory action. I see this discussion as representative of the broader tension between science and environmental policy. When biological decisions are unduly influenced by political concerns, the quality and defensibility of the underlying science is often compromised, and consensus becomes more difficult. Less than rigorous science diminishes the relevance of science to decision-making, and leads to more opinion-driven arguments and poor management outcomes. But science takes time, and policy makers who commit to a science-driven process accept short-term political risk associated with deferred decisions for the sake of long-term

defensibility and probably better management. I recognize the risks associated with attempting to incorporate higher goals into the MSCS at a later date. I nonetheless encourage sustaining the relevance of science to our process of making biological decisions, with the expectation of better long-term outcomes.

Karl

Reply Separator

Subject: MSCS species goal prescription for spring-run salmon
Author: SCANTREL@hq.dfg.ca.gov at EXTERNAL
Date: 5/19/1999 9:28 PM

Mr. Mike Fris
Mr. Karl Halupka

At the MSCS meeting today (May 19, 1999), we discussed Agency comments on the draft MSCS document. In regard to the revised species goal prescription for Sacramento spring-run chinook salmon, both NMFS and USFWS cautioned against using DFG's suggested recovery goal target numbers described in our revised comments on the Administrative Draft MSCS (sent on May 17, 1999). Both NMFS and USFWS said we should use the Restoration Criteria described in the Recovery Plan for the Sacramento/San Joaquin Delta Native Fishes (USFWS 1995) for the interim, until NMFS completes the Multi-species Recovery Plan for Pacific salmon and steelhead. It was felt the Delta Native Fishes plan criteria could serve as a defensible placeholder since the plan has been reviewed and published. A methodology for developing quantified recovery criteria, similar to what was done for winter-run chinook salmon, would be described in the MSCS. NMFS felt it was not prudent to use recovery criteria suggested by DFG which have not been peer reviewed.

I discussed the issue with Mr. Ron Rempel and he strongly urged that DFG's recommendations be incorporated into the MSCS. He said it is preferable to include criteria that biologists estimate are necessary for recovery of spring-run, based on best professional judgement and our current understanding spring-run population genetics. If we use the numbers in the Delta Native Fishes recovery plan and later learn through the NMFS Multi-species Recovery planning effort that the criteria for spring-run are too low, politically it will be very difficult to increase these numbers and we would have to initiate reconsultation on the MSCS.

In summary, the species goal prescription and targets recommended by DFG for Sacramento spring-run chinook salmon should be included in the draft MSCS document. The public will have an opportunity to comment on these targets when the MSCS goes out for review. DFG will assume that its recommended recovery criteria for spring-run will be incorporated into the MSCS unless we hear from you before the end of business Friday, May 21, 1999. If you have any questions please call me.

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